



5201 Truxtun Avenue, Bakersfield, CA 93309

October 26, 2018

Cindy Beeler
USEPA Region 8
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Office of Enforcement, Compliance
and Environmental Justice

RE: NSPS OOOOa Initial Annual Report
Reporting Period: August 2, 2017 through August 1, 2018
Uinta Basin Assets


Dear Ms. Beeler:

As required by 40 CFR 60.5420a(b) of the federal New Source Performance Standards Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities (NSPS OOOOa), Berry Petroleum Company, LLC hereby submits the initial Annual Report for its onshore production assets located in the Uinta Basin covering the reporting period of August 2, 2017 through August 1, 2018.

Please contact me at (661) 616-3941 or jarmstrong@bry.com for any questions concerning this report.

Sincerely,

(b) (6)

 Jon Armstrong
EHS Representative



Berry Petroleum Company, LLC
40 CFR Part 60 Subpart OOOOa Annual Report

Company

Berry Petroleum Company, LLC
5201 Truxton Ave
Bakersfield, CA 93309

Facility Site Name

Uinta Basin Assets

Location

Utah Field Office
4208W 4000 N
Roosevelt, UT 84066

Reporting Period

Starting Date: August 2, 2017
Ending Date: August 1, 2018

Affected Facilities	Subject to Reporting?
Hydraulically fractured/refractured wells [§60.5365a(a)]	Yes
Centrifugal compressors [§60.5365a(b)]	No
Reciprocating compressors [§60.5365a(c)]	No
Pneumatic controllers [§60.5365a(d)]	No
Storage vessels [§60.5365(e)]	No
Group of equipment at a natural gas processing plant [§60.5365a(f)]	No
Sweetening units at natural gas processing plants [§60.5365a(g)]	No
Pneumatic pumps [§60.5365a(h)]	No
Fugitive emission components [§60.5365a(i) and (j)]	Yes

Statement of Certification

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Signature: _____

(b) (6)

Date: _____

10/26/2018

Reporting Requirements and Documentation

Well Affected Facilities

Citation	Requirements	Data Location
§60.5420a(b)(2)(i); §60.5420a(c)(1)(i) through §60.5420a(c)(1)(iii)	I. Records of the following for each well completion operation conducted during the reporting period: <ol style="list-style-type: none"> Well identification name Well location (latitude and longitude to five (5) decimal degrees) API well number Date and time of the onset of flowback following hydraulic fracturing or refracturing Date and time of each attempt to direct flowback to a separator Date and time of each occurrence of returning flowback liquid to well completion or storage vessels (e.g. infeasible to operate separator) Date and time that well was shut in and flowback equipment permanently disconnected Duration of flowback (hours) Duration of gas recovery and type of recovery (hours) Duration of combustion (hours) Duration of venting and reason for venting in lieu of capture or combustion (hours) 	See Attachment 1
§60.5420a(b)(2)(ii); and §60.5420a(c)(2)(ii)	II. Records of deviations during the reporting period as specified in §60.5420a(c)(1)(ii).	
§60.5375a(f); §60.5420a(b)(2)(iii); §60.5420a(c)(1)(vii); and §60.5432a	III. Records that support a determination under §60.5432a that the well affected facility is a low pressure well.	

Fugitive Emission Component Affected Facilities

Citation	Requirements	Data Location
§60.5420a(b)(2)(i); §60.5420a(c)(1)(i) through §60.5420a(c)(1)(iii)	I. For the collection of fugitive emission components at each well site and/or each compressor station within the company defined area, report for each monitoring survey: <ol style="list-style-type: none"> Date of the survey Beginning and end time of the survey Name of the operator(s) performing survey <ol style="list-style-type: none"> If the survey is performed by optical gas imaging, note the training and experience of the operator(s). Ambient temperature, sky conditions, and maximum wind speed at the time of the survey Monitoring instrument used Any deviations, or a statement that there were no deviations, from the monitoring plan Number and type of fugitive emissions components for which fugitive emissions were detected Number and type of fugitive emissions components that were not repaired as required in §60.5397a(h) Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emissions components monitored The date of successful repair of each identified fugitive emissions component Number and type of fugitive emissions components placed on delay of repair and explanation for each delay of repair Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding 	See Attachment 2

Attachment 1

Well Affected Facilities [§60.5420a(b)(2)]

Well Affected Facilities

Table 1-A: Well Flowback Information

Well Name	Location of the Well	API Well Number	Date	Time Start	Time End	Flowback Stage	Duration of Flowback (hours)	Duration of Recovery to Flow Line (hours)	Duration of Combustion (hours)	Duration of Venting (hours)	Reasons for Venting in Lieu of Capture or Combustion	Exception Claimed Under §60.5375a(a)(3)	Comments/Explanation
Lake Canyon Fee 8-15D-56	(b) (9)	43-013-50597	8/17/2017	7:00 AM	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Straight to Production

Table 1-B: Well Affected Facility Deviations from §60.5375a

Well Name	Deviation Description	Comments
No deviations from the well affected facility requirements occurred during the reporting period		

Attachment 2

Fugitive Emission Component Affected Facilities [§60.5420a(b)(7)]

Fugitive Emission Component Affected Facilities at Well Sites and Compressor Stations

Table 2-A: General Fugitive Emissions Survey Information

Survey ID	Survey Location	Date of Survey [§60.5420a(b)(7)(i)]	Beginning Time [§60.5420a(b)(7)(ii)]	Ending Time [§60.5420a(b)(7)(iii)]	Survey Technician ¹ [§60.5420a(b)(7)(iii)]	Monitoring Instrument Used [§60.5420a(b)(7)(v)]	Survey Conditions [§60.5420a(b)(7)(iv)]			Deviations from EMP? ² (Y/N) [§60.5420a(b)(7)(vi)]
							Ambient Temperature (F)	Max Wind Speed (mph)	Sky Conditions	
1	Lake Canyon Fee 8-15D-56	10/11/2017	2:21 PM	3:00 PM	A.Hoopes	OGI Camera	61	12	Clear	No
2	Lake Canyon Fee 8-15D-56	8/21/2018	11:58 AM	12:39 PM	A.Hoopes	OGI Camera	61	5	Cloudy	Yes

Notes

1. Table 2-B lists the Monitoring Survey Technician experience and training
2. Table 2-C provides descriptions of any deviations from the Emissions Monitoring Plan (EMP)

Table 2-B: Survey Technician Training and Experience [§60.5420a(b)(7)(iii)]

Technician ID	Name	OGI Training Completed	OGI Experience
1	A.Hoopes	Yes	3 Years

Table 2-C: Deviation from EMP Survey Description

Survey ID	Survey Location	EMP Category	EMP Deviation Description
2	Lake Canyon Fee 8-15D-56	Survey Deadlines	Semiannual survey performed 10 months after initial survey

Fugitive Emission Component Affected Facilities at Well Sites and Compressor Stations

Table 2-D: Fugitive Emission Component Affected Facility Monitoring Survey Records

Survey ID	Survey Location	FEC Type [§60.5420a(b)(7)(vii)]	# Found Leaking [§60.5420a(b)(7)(vii)]	# Repaired and Resurveyed During Survey ¹	# Not Repaired per 60.5397a(h) [§60.5420a(b)(7)(viii)]	# of DTM Monitored [§60.5420a(b)(7)(ix)]	# of UTM Monitored [§60.5420a(b)(7)(ix)]
1	Lake Canyon Fee 8-15D-56	Instruments & meters	3	0	0	0	0
2	Lake Canyon Fee 8-15D-56	Valve	1	0	0	0	0
2	Lake Canyon Fee 8-15D-56	Instruments & meters	1	0	0	0	0

Notes

1. Represents leaks that were repaired during the the monitoring survey (i.e. initial or routine survey).

See Table 2-E for information on leakers not repaired during survey

Table 2-E: Fugitive Emission Component Affected Facility Repair and Resurvey Records for Components Not Repaired During Survey

Survey ID	Survey Location	Leaking Component ID	FEC Type	Placed on Delay of Repair (Y/N) [§60.5420a(b)(7)(xi)]	Reason for DOR [§60.5420a(b)(7)(xi)]	Date of Successful Repair [§60.5420a(b)(7)(x)]	Resurvey Instrument Type [§60.5420a(b)(7)(xii)]
1	Lake Canyon Fee 8-15D-56	Tag 1	Instruments & meters	No	n/a	10/13/2017	OGI Camera
1	Lake Canyon Fee 8-15D-56	Tag 2	Instruments & meters	No	n/a	10/13/2017	OGI Camera
1	Lake Canyon Fee 8-15D-56	Tag 3	Instruments & meters	No	n/a	10/13/2017	OGI Camera
2	Lake Canyon Fee 8-15D-56	Tag 1	Valve	No	n/a	8/23/2018	OGI Camera
2	Lake Canyon Fee 8-15D-56	Tag 2	Instruments & meters	No	n/a	8/23/2018	OGI Camera